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UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas

FILED

January 22, 2024

Nathan Ochsner, Clerk of Court

In the Matter of the Search of
5350 AEROPARK DR. APARTMENT
#3804, (TIMBER RIDGE
APARTMENTS), HOUSTON, TEXAS
77032 FURTHER DESCRIBED AS A
GATED APARTMENT COMPLEX
BRICK FOUNDATIONS AND LIGHT-
COLORED SIDING

Case No. **4:24-mc-5131**

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

5350 AEROPARK DR. APARTMENT #3804, (TIMBER RIDGE APARTMENTS), HOUSTON, TEXAS 77032 further described as a gated apartment complex brick foundations and light colored siding, further described in Attachment A located in the Southern District of Texas, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B, incorporated by reference

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. 1951	Hobbs Act Robbery
18 U.S.C. 924(c)	Use of a Firearm During a Crime of Violence

The application is based on these facts:

See Attached Affidavit, incorporated by reference

- ☐ Continued on the attached sheet.
☐ Delayed notice of _____ days (*give exact ending date if more than 30 days*: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Anton Chapman, Special Agent HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone _____ (*specify reliable electronic means*).

Date: January 22, 2024

City and state: Houston, TX


Judge's signature
Hon. Yvonne Y. Ho, U.S. Magistrate Judge
Printed name and title

Sealed

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN THE MATTER OF THE SEARCH OF
5350 AEROPARK DR. APARTMENT
#3804, (TIMBER RIDGE APARTMENTS),
HOUSTON, TEXAS 77032 FURTHER
DESCRIBED AS A GATED APARTMENT
COMPLEX BRICK FOUNDATIONS AND
LIGHT-COLORED SIDING.

Case No. 4:24-mc-5131

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Special Agent Anton Chapman, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant, pursuant to Federal Rule of Criminal Procedure 41.

2. I am a Special Agent with Homeland Security Investigations and have reason to believe that on the premises known as:

**5350 AEROPARK DR. APARTMENT #3804, (TIMBER RIDGE APARTMENTS),
HOUSTON TEXAS 77032 FURTHER DESCRIBED AS A GATED APARTMENT
COMPLEX WITH BRICK FOUNDATIONS AND LIGHT-COLORED SIDING.**

and further described in the following paragraphs and in Attachment A is evidence of criminal activity.

3. I am an agent with Homeland Security Investigations and as such, I have authority to investigate potential violations of federal firearms statutes, violent crimes, and controlled substance laws under Titles 18 and 21 of the United States Code.

4. The statements set forth in this affidavit are based on personal knowledge and the following sources: (a) oral and written reports and other supportive documentation or information about the investigation received from other agents and law enforcement officers participating in or supporting, the investigation, (b) audio and video recordings, and (c) physical surveillance activity. This affidavit is submitted for the limited purpose of securing a search warrant, and thus, I have not included every fact known to me concerning this investigation, but have set forth only those facts I believe are necessary to establish probable cause for the requested warrant.

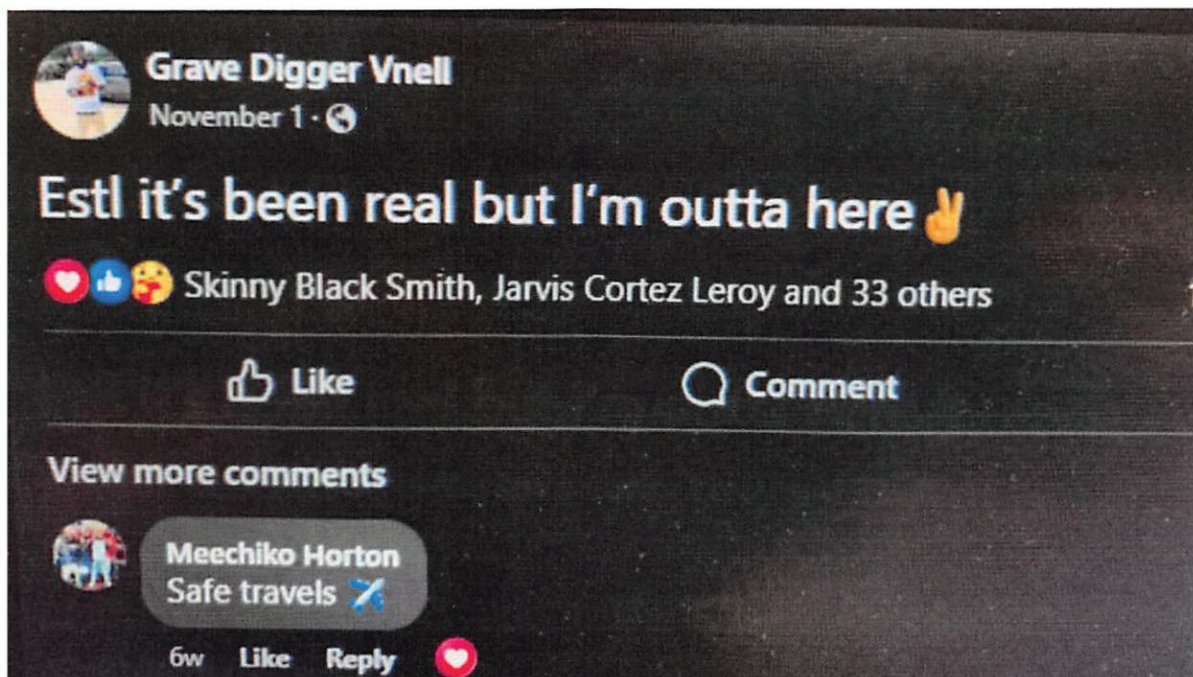
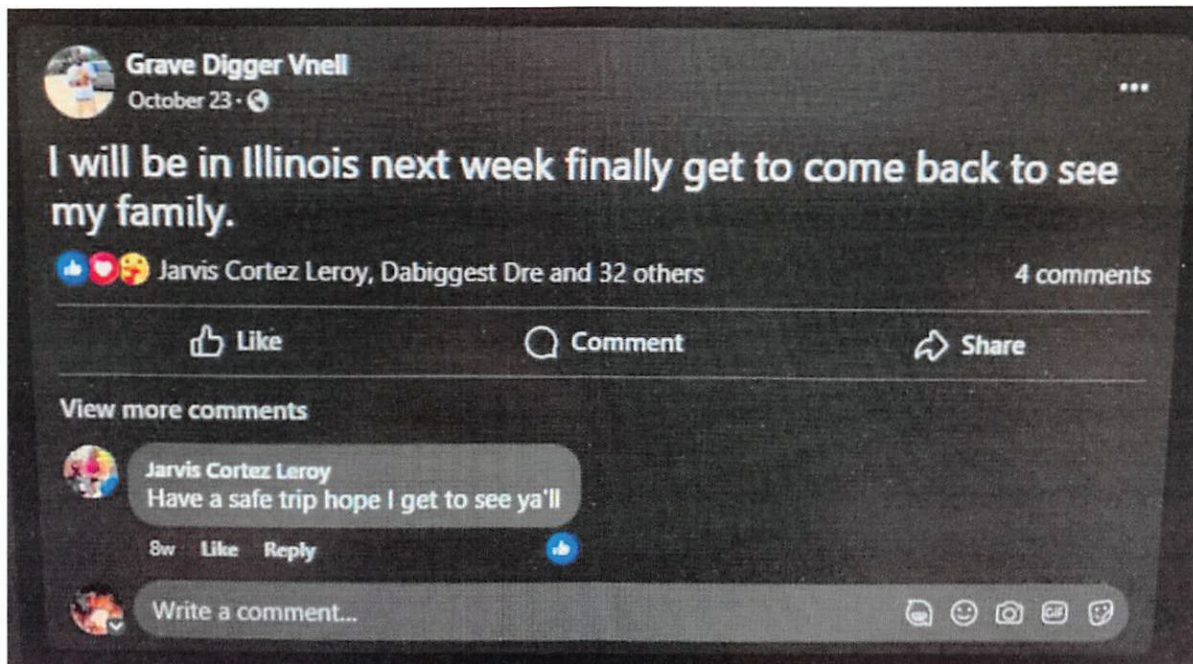
PROBABLE CAUSE

1. This investigation concerns alleged violations of Title 18, United States Code, Sections 1951 Interference with Commerce by Robbery, and 18 United States Code 924(c)(1)(A)(iii) Carry and Use of a Firearm During a Crime of Violence.
2. On or about 9:00 a.m. on October 31st, 2023, a black male wearing all black clothing, a black mask, and black and white shoes, later identified as Vernelle E. Hines M/B 01/12/94, committed an armed robbery of a business at 1901 Central Ave. (Mega Supermarket) in East St. Louis, St. Clair County, Illinois, within the Southern District of Illinois. The female victim M.D. was struck in the head with a black in color pistol multiple times by HINES. In addition, HINES struck her with his hands and kicked her several times in the head causing her to lose several teeth and leaving multiple lacerations to her head. Each time victim M.D. attempted to get up and defend herself, HINES would strike her again, knocking her to the ground. HINES fled the scene after taking United States currency and alcohol from the business. The store was forced to close for the day due to the nature of the crime and victim M.D. being transported to the hospital for her injuries. The encounter was captured on video surveillance within the business.



3. Victim M.D. stated that during her struggle with HINES, she heard HINES' gun discharge. Law Enforcement Investigators located a fired 9mm cartridge casing on scene behind the sales counter where the encounter occurred. Illinois State Police Crime scene collected the spent shell casing as evidence.
4. After the armed robbery was committed, HINES was identified by law enforcement forensically by fingerprints left at the scene of the crime.

5. HINES was indicted in United States District Court for the Southern District of Illinois for Title 18, United States Code, Sections 1951 Interference with Commerce by Robbery, and 18 United States Code 924(c)(1)(A)(iii) Carry and Use of a Firearm During a Crime of Violence (Case Number 24-30008-DWD).
6. HINES is currently on Federal Supervised Release in the Southern District of Texas for a conviction out of the Eastern District of Missouri in Case Number 4:19-CR-00763-HEA-1 for committing a violation of 18 USC § 922(g) for Felon in Possession of a Firearm.
7. HINES is supervised by United States Probation Officer Jocelyn Trujillo in the Southern District of Texas. HINES provided 5350 Aeropark Dr., Apt. 3804 in Houston, Texas (Timber Ridge Apartments) to his United States Probation Officer as his residence. Probation Officer Jocelyn Trujillo conducted a residence check on December 9, 2023, confirming HINES' residence there.
8. Probation Officer Trujillo confirmed that HINES requested, and was granted, permission to travel to the Southern District of Illinois for the time period of October 26, 2023, through November 1, 2023, to attend a funeral. This is consistent with the time period of when the Armed Robbery occurred.
9. Open-source investigation identified a Facebook account belonging to HINES. HINES posted two statements consistent with his travel to the Southern District of Illinois during this time period.



10. On January 19, 2024, agents with Homeland Security Investigations conducted surveillance on HINES' residence at 5350 Aeropark Dr. Apt. 3804, in Houston, Texas. Agents observed a suspect consistent with HINES exit Apartment 3804.

11. Your affiant, therefore, requests this search warrant to authorize a more comprehensive search

of:

5350 AEROPARK DR. #3804, (TIMBER RIDGE APARTMENTS), HOUSTON TEXAS 77032 FURTHER DESCRIBED AS A GATED APARTMENT COMPLEX BRICK FOUNDATIONS AND LIGHT-COLORED SIDING.

As more fully described in Attachment A.

12. Your affiant asserts probable cause exists to believe that evidence of the federal crimes of Title 18, United States Code, Sections 1951 (Hobbs Act), and 924(c) (Carry and Use of a Firearm During a Crime of Violence), will be found therein. And as more fully described in Attachment B.

CONCLUSION

Based on the forgoing, I request that the Court issue the proposed search warrant.

REQUEST FOR SEALING

It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the warrant is relevant to an ongoing investigation into the criminal organizations, as not all of the targets of this investigation will be searched at this time. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

Respectfully submitted,



Anton Chapman
Special Agent
Homeland Security Investigations

Subscribed and sworn telephonically on January 22, 2024 and I find probably cause.



HON. YVONNE Y. HO
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

5350 AEROPARK DR. APARTMENT 3804, (TIMBER RIDGE APARTMENTS), HOUSTON TEXAS 77032 FURTHER DESCRIBED AS A GATED APARTMENT COMPLEX BRICK FOUNDATIONS AND LIGHT-COLORED SIDING.



ATTACHMENT B

Particular Things to be Seized

1. All firearms, ammunition, and explosives;
2. Any electronic devices belonging to Hines that would document Hines' travel to the Southern District of Illinois or Hines' use of Facebook;
3. Any and all black face masks consistent with Hines' during the Armed Robbery (depicted below);
4. Any black and white tennis shoes consistent with Hines' clothing during the Armed Robbery (depicted below);
5. Any records or evidence that relate to violations of Title 18, United States Code, Sections 1951 Interference with Commerce by Robbery, and 18 United States Code 924(c)(1)(A)(iii) Carry and Use of a Firearm During a Crime of Violence;

